

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE	)	
CENTRE GMBH and WEST PUBLISHING	)	
CORPORATION,	)	
	)	
Plaintiffs and	)	
Counterdefendants,	)	
	)	
v.	)	C.A. No. 20-613 (SB)
	)	
ROSS INTELLIGENCE INC.,	)	
	)	
Defendant and	)	
Counterclaimant.	)	

**PLAINTIFFS AND COUNTERDEFENDANTS' MOTION FOR A LIMITED  
EXEMPTION FROM THE STANDING ORDER REGARDING PERSONAL  
ELECTRONIC DEVICES**

Plaintiffs and Counterdefendants Thomson Reuters Enterprise Center GmbH and West Publishing Corporation (“Thomson Reuters”) hereby moves for an order to exempt Dale Cendali, Yungmoon Chang, Eric Loverro, Miranda Means, Joshua Simmons, and Jeremy King from the District of Delaware’s May 17, 2024 Standing Order on Procedures Regarding the Possession and Use of Cameras and Personal Electronic Devices by Visitors to the J. Caleb Boggs Federal Building and United States Courthouse (the “May 17, 2024 Standing Order”). In support of this Motion, Thomson Reuters states as follows:

1. The District of Delaware’s May 17, 2024 Standing Order provides procedures to regulate the possession and use of personal electronic devices by visitors to the J. Caleb Boggs Federal Building and United States Courthouse, which require inter alia, for visitors to place personal electronic devices in a locked pouch provided by U.S. Marshals. Paragraph 4 of the May 17, 2024 Standing Order provides for certain exemptions to the Standing Order.
2. A pretrial conference is scheduled for April 9, 2025, in Courtroom 4A.

3. Thomson Reuters requests Dale Cendali, Yungmoon Chang, Eric Loverro, Miranda Means, Joshua Simmons and Jeremy King, co-lead counsel, be allowed to bring their electronic devices into the courtroom for use during the hearing. Ms. Cendali, Ms. Chang, Mr. Loverro, Ms. Means, Mr. Simmons, and Mr. King have been admitted *pro hac vice* in this matter, but do not have access to a state-issued bar card.

WHEREFORE, Thomson Reuters respectfully requests that the Court issue an order to exempt Ms. Cendali, Ms. Chang, Mr. Loverro, Ms. Means, Mr. Simmons, and Mr. King from the May 17, 2024 Standing Order.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Michael J. Flynn*

---

Michael J. Flynn (#5333)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
(302) 658-9200  
mflynn@morrisnichols.com

April 2, 2025

IT IS SO ORDERED this \_\_\_\_ day of April, 2025.

---

The Hon. Stephanos Bibas